

O'NEILL / HASSEN

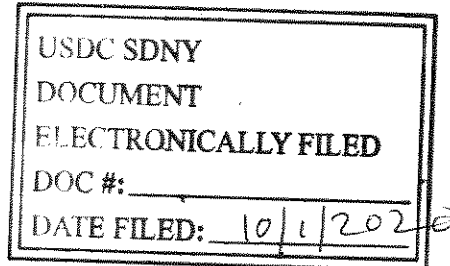
Attorneys at Law

MEMO ENDORSED

September 30, 2020

VIA ECF

Honorable Denise L. Cote
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007



RE: *United States v. Jose Baez*, 19 Cr 463 (DLC)

Dear Judge Cote:

I represent Jose Baez in the above captioned matter. I write to request a modification of his bond. The government has no objection to this request.

Mr. Baez's current bond allows him to travel only in the Southern and Eastern Districts of New York. I am writing to request that his travel restriction be amended to allow travel to New Jersey. Mr. Baez is a driver for various ride share companies, like Uber and Lyft and these companies require him to travel to New Jersey to pick up and drop of passengers. He provides for his family and has struggled to make ends meet with the restriction on travel. I have discussed this with his probation officer, and he consents to this request. The government has no objection to the proposed modification.

I thank the Court for its attention to and consideration of this matter.

Grainne E. O'Neill
10/1/20

Kind regards,

/s/

Grainne E. O'Neill

cc: all parties via ECF